

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

RANJITHA SUBRAMANYA, individually	:	
and on behalf of a class of those similarly	:	Case No. 2:20-CV-3707
situated, et al.,	:	
	:	Chief Judge Algenon L. Marbley
Plaintiffs,	:	
	:	Magistrate Judge Deavers
vs.	:	
	:	JOINT MOTION FOR MAGISTRATE
UNITED STATES CITIZENSHIP AND	:	JUDGE MEDIATED NEGOTIATIONS FOR
IMMIGRATION SERVICES, et al.,	:	CONSENT ORDER
	:	
Defendants.	:	

Counsel for the parties respectfully request his Honor assign or request the service of a Magistrate Judge to mediate the above-captioned action, on or between the dates of Tuesday, August 11, through Friday, August 14, 2020. The parties make this request pursuant to this Court's Order, (ECF No. 46), granting the Parties' Joint Motion to Continue the Preliminary Injunction Hearing, (ECF No. 45), "so that the parties will have time to negotiate a consent decree to resolve the claims at issue in Plaintiffs' complaint."

Counsel for the parties have established "benchmarks" or an outline to resolution of this action for which they request the mediation skills of this Court to negotiate final parameters/deadlines to each benchmark, for inclusion in a Consent Order.

This request is not made for purposes of, and will not result in delay, but, rather, is intended to serve the interest of all parties, conserve the resources of this Court, and advance judicial economy by exploring the opportunity for extra-judicial resolution as ordered by this Court pursuant to granting the Parties' Joint Motion to Continue the Preliminary Injunction Hearing. ECF No. 46.

Respectfully submitted,

DAVID M. DEVILLERS
United States Attorney

s/Christopher R. Yates
CHRISTOPHER R. YATES (0064776)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
E-mail: christopher.yates@usdoj.gov

Attorney for Defendants

s/Caroline H. Gentry
CAROLINE H. GENTRY (0066136)
Porter Wright Morris & Arthur LLP
One South Main Street, Suite 1600
Dayton, Ohio 45402
E-mail: cgentry@porterwright.com

and

Robert H. Cohen (0009216)
David P. Shouvin (0066154)
Kirsten R. Fraser (0093951)
Porter Wright Morris & Arthur LLP
41 South High Street, Suites 2800-3200
Columbus, Ohio 43215
E-mail: rcohen@porterwright.com
E-mail: dshouvin@porterwright.com
E-mail: kfraser@porterwright.com

and

Ana P. Crawford (0090581)
Porter Wright Morris & Arthur LLP
250 East Fifth Street, Suite 2200
Cincinnati, Ohio 45202
Email: acrawford@porterwright.com

Attorneys for Plaintiffs